## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (Greenbelt Division)

UNITED STATES OF AMERICA,	)
Plaintiff,	) Case No. 03-cr-00457-PJM
v.	)
KENNETH JAMAL LIGHTY,	)
Defendant.	) )

### MOTION FOR LEAVE TO FILE SEALED MATERIALS

Kenneth Jamal Lighty, through his attorneys, hereby moves this Honorable Court for leave to file his Brief in Support of Petitioner's Amended Motion Regarding Claims Other Than Claim I In His Motion for Relief Under 28 U.S.C. § 2255 and the exhibits thereto under seal.

As grounds therefore, Mr. Lighty states that his Brief and the exhibits thereto contain voluminous confidential information, including: medical records; personal identifiers; grand jury materials; presentence reports; supervised release reports; violation reports; probation records; sentencing recommendations; social security numbers; tax payer identification numbers; names of minors; dates of birth; home addresses; driver's license numbers; employment histories; financial information; information regarding cooperation with the Government; victim information; and reference materials that are already sealed and under protective order by this Court.

WHEREFORE, Mr. Lighty requests that this Honorable Court grant this motion for leave to file his Brief and the exhibits thereto under seal.

A proposed order to seal is attached.

Dated: October 11, 2019 Respectfully submitted,

### /s/ Julie Brain

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### /s/ Tiffani Hurst

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# **CERTIFICATE OF SERVICE**

I hereby certify that, on October 11, 2019, I served a copy of the foregoing Motion for Leave to File Sealed Materials on counsel for the United States through the Court's ECF system and by electronic mail.

/s/	
Seth Rosenthal	